

JEREMY J. THOMPSON  
Nevada Bar No. 12503  
**CLARK HILL PLLC**  
3800 Howard Hughes Drive, Suite 500  
Las Vegas, Nevada 89169  
E-mail: [jthompson@clarkhill.com](mailto:jthompson@clarkhill.com)  
Telephone: (702) 862-8300  
Facsimile: (702) 862-8400  
*Attorney for Defendant*  
*Equifax Information Services LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CLAYTON R. FREEMAN,

Plaintiff,

vs.

BMW FINANCIAL SERVICES NA, LLC,  
EQUIFAX INFORMATION SERVICES LLC,  
and EXPERIAN INFORMATION  
SOLUTIONS, INC.,

Defendants.

**Case No. 2:20-cv-01355-JCM-BNW**

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT EQUIFAX  
INFORMATION SERVICES LLC TO  
FILE ANSWER**

**FIRST REQUEST**

Defendant Equifax Information Services LLC (“Equifax”) has requested an extension of time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that Defendant Equifax Information Services LLC’s time to answer, move or otherwise respond to the Complaint in this action is extended from September 17, 2020 through and including **October 18, 2020**. The request was made by Equifax so that it can have an opportunity to collect and review its internal files pertaining to the allegations in the

///

///

1 ///

2 Complaint, and Plaintiff approves. This stipulation is filed in good faith and not intended to cause  
3 delay.

4 Respectfully submitted, this 17<sup>th</sup> day of September, 2020.

5  
6 CLARK HILL PLLC

7 By: /s/ Jeremy J. Thompson  
8 Jeremy J. Thompson  
9 Nevada Bar No. 12503  
10 3800 Howard Hughes Pkwy,  
11 Suite 500  
12 Las Vegas, NV 89169  
13 Tel: (702) 862-8300  
14 Fax: (702) 862-8400  
15 Email: [jthompson@clarkhill.com](mailto:jthompson@clarkhill.com)

16 *Attorney for Defendant Equifax Information*  
17 *Services LLC*

**No opposition**

/s/ Michael Kind  
Michael Kind, Esq.  
Nevada Bar No. 13903  
KIND LAW  
8860 South Maryland Parkway, Suite 106  
Henderson, NV 89123  
Phone: (702) 337-2322  
Fax: (702) 329-5881  
Email: [mk@kindlaw.com](mailto:mk@kindlaw.com)

*Attorney for Plaintiff*

18  
19 IT IS SO ORDERED:



United States Magistrate Judge

20 DATED: \_ 9/22/2020